

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**CARMELO TREVISO, Individually and
On Behalf of All Other Similarly Situated,**

Plaintiff,

vs.

**NATIONAL FOOTBALL LEAGUE, dba
PRO FOOTBALL HALL OF FAME,**

Defendant.

CASE NO. 5:17-cv-00472

JUDGE CHRISTOPHER A. BOYKO

**DECLARATION OF SCOTT M. ZURAKOWSKI IN SUPPORT OF
DEFENDANT, NATIONAL FOOTBALL MUSEUM, INC., dba PRO
FOOTBALL HALL OF FAME'S SUPPLEMENTAL MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S RENEWED MOTION FOR CLASS
CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL
INSTANTER**

I, Scott M. Zurakowski, state the following:

1. I am an attorney licensed to practice law in the state of Ohio. I am competent to testify and the matters set forth below are personally known to me.
2. Collectively attached hereto as Exhibit A is a true and accurate copy of the Joint Stipulation Re Appointment of Receiver and Restraining Order and the court's signed Order approving the stipulation, filed with the United States District Court for the Central District of California, Case No. 8:18-CV-01644-VAP-KES, and entered on February 13, 2019.
3. Exhibit A is a public record and was accessed and obtained from the United States District Court for the Central District of California's Pacer online docket.

4. Attached hereto as Exhibit B is a true and accurate copy of the EA Bankruptcy Petition, filed with the United States Bankruptcy Court, Central District of California, Case No. 8:19-bk-10822-CB, on March 7, 2019.

5. Exhibit B is a public record and was accessed and obtained from the United States Bankruptcy Court, Central District of California's Pacer online docket.

6. Attached hereto as Exhibit C is a true and accurate copy of the California criminal complaint, filed in the United States District Court for the Central District of California, Case No. 8:19-mj-00241-DUTY, on March 22, 2019.

7. Exhibit C is a public record and was accessed and obtained from the United States District Court for the Central District of California's Pacer online docket.

8. Attached hereto as Exhibit D is a true and accurate copy of the New York criminal complaint, filed in the United States District Court for the Southern District of New York, Case No. 1:19-mj-02927-UA, on March 24, 2019.

9. Exhibit D is a public record and was accessed and obtained from the United States District Court for the Southern District of New York's Pacer online docket.

10. Attached hereto as Exhibit E is a true and accurate copy of Michael Avenatti's declaration filed in *Bahamas Surgery Center, LLC v. Kimberly-Clark Corporation, et al.*, Case No. 2:14-cv-08390-DMG-PLA, in the United States District Court for the Central District of California.

11. Exhibit E is a public record and was accessed and obtained from the United States District Court for the Central District of California's Pacer online docket.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 3rd, 2019, in Canton, Ohio.

/s/ Scott M. Zurakowski

Scott M. Zurakowski